

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO, EASTERN DIVISION**

ANGELA THOMPSON and)	
BRIAN THOMPSON,)	CIVIL COMPLAINT
)	
Plaintiffs,)	CASE NO. 1:18-CV-01836
)	
v.)	JUDGE DONALD C. NUGENT
)	
MEDGUARD ALERT, INC.,)	MAG. JUDGE JONATHAN D.
QUICK RESPONSE ALERT, INC.,)	GREENBERG
and LIFEWATCH INC.)	
)	JURY DEMAND
Defendant.)	

**DECLARATION IN SUPPORT OF MOTION
FOR CLERK'S CERTIFICATE OF DEFAULT**

I, Jonathan Hilton, state as follows:

1. I am an attorney with the law firm Hilton Parker LLC, attorneys for Angela and Brian Thompson, and am fully familiar with the facts and circumstances stated herein.

2. This action was commenced pursuant to 15 U.S.C. § 1692 *et seq.*, 47 U.S.C. § 227 *et seq.*, and Ohio Rev. Code Ann. § 1345 *et seq.* on August 9, 2018.

3. According to the docket in this case, Defendant Lifewatch Inc. was sent a copy of the Summons and Complaint by certified mail on October 9, 2018. The summons and complaint were signed for by Damien Dempsey on behalf of Lifewatch Inc. on October 15, 2018. The Summons Returned Executed was filed by the Clerk on October 19, 2018.

4. The time for Defendant to answer, respond, or otherwise move with respect to the Complaint has expired and the time to answer or respond has not been extended.

WHEREFORE, Plaintiffs Angela and Brian Thompson respectfully request that the Clerk note the default of Defendant Lifewatch Inc. and issue a Certificate of Default.

Dated: November 7, 2018

By: s/ Jonathan Hilton

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